

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**LORI HAGUE, individually, and on behalf of all  
others similarly situated,**

**Plaintiff,**

**- against -**

**SUNPATH, LTD,**

**Defendant.**

**Docket No. 3:21-cv-08053-ZNQ**

**DECLARATION OF LORI HAGUE IN OPPOSITION TO DEFENDANT'S MOTION  
TO DISMISS**

I, **LORI HAGUE**, hereby affirm, that if called to testify in this case, I would plead as follows:

1. I make this Declaration based upon my own personal knowledge.
2. I submit this declaration in opposition to the Defendant's Motion to Dismiss filed in this action.
3. I received countless calls from the Defendant or someone claiming to be the Defendant, all trying to sell me an auto warranty. Although I did not track all of these calls I received, I do still have records of receiving the following calls:
  - a. 1/11/21 3:41pm, which played a recording: If you are interested in renewing your auto warranty now please press five or press nine to be removed from our list (I pressed nine);

b. 1/28/21 12:32pm which again played a recording: If you are interested in renewing your auto warranty now please press five or press nine to be removed from our list (I again pressed nine);

c. 1/29/21 11:23am

d. 1/29/21 11:36am

e. 2/4/21 11:44am

f. 2/9/21 1:48pm

g. 2/18/21 9:47am

h. 3/15/21 1:20pm

4. On January 29, 2021, I finally spoke to a person on one of these calls, and asked them which company they were calling from, at which point that person stated that they were calling from Sunpath.
5. All of these calls came from phone numbers that were made to appear as if they were originating from New Jersey, with area codes such as 732, 848 and 856.
6. When I called these numbers back, they all have the same recorded message stating “thank you for calling auto warranty services, to opt out from our calling list please press 1”.
7. I am a resident of New Jersey, which is where I live.
8. I received all of these calls on my cell phone number of (732) 535-2493, while I was in New Jersey.
9. I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct.

Dated: July 6, 2021

  

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LORI HAGUE